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November 20, 2009

Sharon Gillett, Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Reference: Docket No. 02-60

Dear Ms. Gillett:

This letter requests a one-year extension of the June 30, 2010, deadline for filing the FCC Form 466A for the Michigan Public Health Institute (MPHI) Rural Health Care Pilot Program (RHCPP) project. In addition, this letter requests a waiver of the requirement in FCC Order 07-198 that the Pilot Program be limited to three Funding Years.

Like many other RHCPP projects, MPHI is concerned that it will be unable to meet the June 30<sup>th</sup> filing deadline. The administrative process that USAC has chosen to employ assures that federal funds are well spent, but it has had the unintended effect of extending our project's schedule well beyond what was planned. We had hoped to begin construction of our state-wide project this past spring; instead, the beginning of construction will probably be delayed until mid- 2010 or later.

MPHI may be able to file the 466A by June 30<sup>th</sup>. However, vendor contract negotiations for a state-wide project of this magnitude will be complicated and time-consuming. Cost figures will have to be supplied to over 500 health care providers so they can determine if they wish to continue their participation in the project. In addition, experience has shown that the duration of USAC's administrative reviews is always longer than expected.

MPHI is also concerned about the overall success of the RHCPP. Twenty-eight months into its 36-month lifespan, less than \$9 million (2%) of the RHCPP's \$418 million in funding has been paid out, and less than \$30 million (7%) in funding commitments have been made. Funds have not yet been committed to the largest statewide projects. Wouldn't it be prudent to extend the June 30, 2010, deadline to ensure that most state and regional projects are funded?

The proposed extension will allow MPHI to complete the project without undue haste, in an efficient and cost-effective manner. Therefore, MPHI respectfully requests that the filing deadline for the MPHI RHCPP project's FCC Form 466A be extended to June 30, 2011.

Sincerely,

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